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Attorneys for Defendant Thomas Jefferson School of Law

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH CENTRAL DIVISION

JESSE ANNE MAJORS,

Plaintiff,

v.

THOMAS JEFFERSON SCHOOL OF LAW, et al,

Defendants,

RULE 11 MOTION

Case No.: 2:11cv00558 CW

Defendant moves the court for an award of attorneys' fees pursuant to Rule 11 Fed. R. Civ. P. for the necessity of responding to Plaintiff's Motion for Imposition of Sanctions Against Defense Counsel date August 4, 2011 on the grounds that Plaintiff failed to comply with the safe harbor provisions of Rule 11 prior to filing said motion and that the motion is otherwise both procedurally and substantively baseless.

DATED this 10th day of August, 2011.

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/s/ Robert H Wilde

ROBERT H. WILDE

Attorney for Defendant Thomas Jefferson School of Law

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Delivery Certificate

I hereby certify that I caused a true and correct copy of the foregoing Motion to be served by the method(s) indicated below and addressed to the following on this 10th day of August, 2011.

Jesse Anne Majors 6649 South 5500 West West Jordan, Utah 84081 Jessemajors@netscape.com

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/s/ Robert	H Wilda	
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